

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JEFFREY S. VAUGHN, individually and  
on behalf of those Class Members similarly  
situated,

Plaintiff,

-against-

LEEDS, MORELLI & P.C., LEEDS,  
MORELLI & BROWN, L.L.P., LEEDS &  
MORELLI, LEEDS, MORELLI &  
BROWN, PRUDENTIAL SECURITIES,  
INC., PRUDENTIAL FINANCIAL, INC.,  
WACHOVIA CORPORATION,  
WACHOVIA SECURITIES, LLC,  
LENARD LEEDS, STEVEN A.  
MORELLI, JEFFREY K. BROWN,  
JAMES VAGNINI, FREDERIC DAVID  
OSTROVE, ROBERT JOHN VALLI, JR.,  
DISCRIMINATION ON WALL STREET,  
INC. DISCRIMINATION ON WALL  
STREET, MANHATTAN, INC., JOHN  
DOES, 1-10 AND JANE DOES, 1-10 a  
fictitious designation for presently  
unknown licensed attorneys, professionals  
and/or unknown persons or entities,

Defendants.

Case No. 04 Civ. 8391 (DLC)

**DEFENDANTS' PRUDENTIAL  
FINANCIAL INC. AND  
PRUDENTIAL SECURITIES INC.  
RULE 7.1. STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel for defendants Prudential Financial, Inc. and Prudential Securities, Inc., hereby certify that Prudential Financial, Inc. is the parent company of Prudential Equity Group, LLC, formerly known as Prudential Securities, Inc. Prudential Financial, Inc. does not have any stockholders who own 10% or more of the company.

Dated: New York, New York  
August 28, 2007

PAUL, WEISS RIFKIND, WHARTON &  
GARRISON LLP

By: /s/ Liza M. Velazquez

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Financial, Inc.*

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and individual Defendant members or  
associates of Leeds, Morelli & Brown, P.C.*